

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: AVANDIA MARKETING,
SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION

MDL Docket No. 1871

**RENEWED APPLICATION FOR APPOINTMENT OF
SHANNON MEDLEY TO THE PLAINTIFF'S STEERING COMMITTEE**

Pursuant to Case Management Order No 1, Shannon Medley respectfully assures the Court that she is well-versed in pharmaceutical and mass tort litigation, has the time and resources to commit to this project, and willingness to cooperate and collaborate.

MOTIVATION

“Oklahoma ranks at the top of the nation in the number of people with diabetes per capita. More than 200,000 people in Oklahoma, about 10 percent, are diabetic, and at least 600,000 more are pre-diabetic.”¹ As a result, Ms. Medley’s firm, known for its mass tort work in Oklahoma, has received hundreds of inquiries about Avandia, and is undertaking new cases daily. Recently filed cases include a class action on behalf of patients who received Avandia from the Bureau of Indian Affairs. An estimated 60,000 Native Americans in Oklahoma have diabetes. Ms. Medley’s firm has a unique history of working with members of Native American tribes, including Creek, Citizens Band Pottawatomie, Absentee Shawnee, Pawnee, Comanche, and Kiowa, in which Ms. Medley’s partner was made an honorary chief. In addition to the BIA class action, Sill & Medley has agreed to represent multiple Native American Tribes in Avandia litigation, with claims seeking damages for funds spent on prescriptions for the drug, medical monitoring, and healthcare expenses for injured members.

¹ Associated Press, 10/30/2007

PROFESSIONAL EXPERIENCE

Shannon Medley graduated Magna Cum Laude and Phi Beta Kappa with a Bachelor of Science degree from Texas Christian University. Ms. Medley is also a graduate of the Southern Methodist University School of Law, where she was involved in Civil Litigation Clinic and Phi Delta Phi. As an associate at the Oklahoma firm Sill, Beadles, Johnson, Biscone & White, Ms. Medley prosecuted more than one thousand pharmaceutical suits, with total client recoveries well into nine figures.

Ms. Medley then co-founded Sill & Medley, with staffed offices Oklahoma City, OK, Shawnee, OK, and opening soon in Edmond, OK. She is currently co-counsel in the Oklahoma Baycol class action. The certified class, with an estimated 600 to 3600 members, is proceeding toward trial. Recently, Sill & Medley filed the first Trasylol case in the Oklahoma State Court system. The firm was also recently chosen to coordinate discovery in the Antlers, OK air-crash litigation.

Most recently, Sill & Medley agreed to represent several hundred plaintiffs who were possibly exposed to HIV and hepatitis in Las Vegas healthcare facilities. The consolidated plaintiffs' claims, which stem from the reuse of syringes, include fraud, civil conspiracy, and gross negligence.

Sill & Medley's attorneys' extensive product liability experience ranges from the early mass torts (e.g. Dalkon Shield I.U.D.) to the ongoing (e.g. Prempro) and recently consolidated for multidistrict litigation (e.g. Medtronic Inc., Sprint Fidelis Leads).

Ms. Medley's firm currently represents several "PPH" Plaintiffs in MDL 1203, Diet Drugs, as well as the final remaining "PPH" Plaintiff in the New Jersey consolidated diet drug litigation. Ms. Medley was plaintiffs' co-counsel in developing and implementing the Oklahoma state court plan for processing hundreds of diet drug cases. Conducted much like an MDL, the Oklahoma state court system disposed of virtually all filed diet drug cases with unrivaled speed.

Ms. Medley's firm was trial counsel, as well as appellant counsel, in several published opinions clarifying product liability law including Johnson v. Ford Motor Co., 45 P.3d 86 (Oklahoma Supreme Court, 2000), clarifying Oklahoma law on expert testimony and enhancement of injury, and Hagy v.

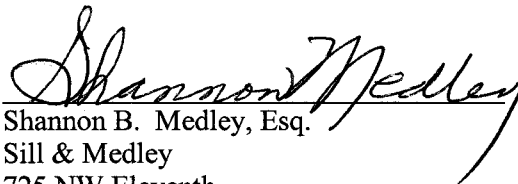
American Honda Motor Co., 125 F. Supp.2d, 456 (2002), clarifying diversity jurisdiction in products liability.

Ms. Medley has frequently served on the Advisory Board for Oklahoma Trial Lawyers Association, and teaches Continuing Legal Education for the organization. Her lecture experience includes the "Products Liability for Trial Lawyers: Current State of Fen-Phen Litigation" series. Ms. Medley is also a former member of American Inns of Court and College of the State Bar of Texas.

COMMITMENT

Ms. Medley's firm has been cooperating and collaborating with fellow Avandia Plaintiffs counsel since May 2007. Its efforts include scheduling several meetings in New York prior to the JPML hearing, participating in joint submissions to this Court, attending the initial meeting with defense counsel in Philadelphia, and advancing considerable financial resources to a fund created for the joint prosecution of Avandia claims. Ms. Medley and her firm are eager to continue providing human and financial resources to assist this litigation.

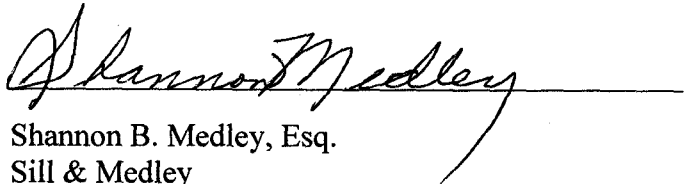
Respectfully submitted this 21st day of March, 2008.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Application for Appointment to Plaintiff's Steering Committee was filed electronically and is available for viewing and downloading from the ECF system. A true and correct copy of the foregoing was served upon all counsel of record as reflected in the Court's service list as of March 24, 2008 by either electronic service or via first class mail, postage pre-paid, this 24th day of March, 2008:

A handwritten signature in cursive script, reading "Shannon B. Medley", is written over a horizontal line.

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